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IN THE UNITED STATES BANKRUPTCY, DISTRICT OF UTAH
NORTHERN DIVISION

In the Matter of:

KRYSTAL MARIE PACE

Debtor.

Case No. 15-29428

Trustee: Lon Jenkins

Judge: R. Kimball Mosier

DEBTOR'S OBJECTION TO TRUSTEE'S MOTION TO DISMISS

COMES NOW, the Debtor above named, by and through her attorney and hereby files this
Objection to the Trustee's Motion to Dismiss. Said Objection is based upon the following grounds:

1. That the Debtor was unable to attend the first meeting of creditors due to surgical emergencies at the Debtor's work.
2. The Debtor was informed by her employer that she would lose her job if she missed that day of work.
3. Debtor's employment is necessary for a chapter 13 plan to work.
4. Debtor requests that her 341 hearing be rescheduled for another time.
5. Debtor did fail to make her first months payment, but that said payment, along with Decembers payment can and will be made on December 22nd 2015 (within two weeks of the Confirmation Hearing).

6. Debtor requests that this case not be dismissed and the Court require her November and December payments to post within 14 days of the Confirmation Hearing.

WHEREFORE, the Debtor respectfully requests that the court not dismiss this case against Debtor, that they reschedule her first meeting of creditors and that her case should be dismissed if her November and December 2015 payments do not post within 14 days from the Debtors confirmation hearing scheduled for December 17th, 2015.

Dated this 16th day of December, 2015.

/s/ Jeremy B. Atwood
Attorney for Debtor

CERTIFICATE OF SERVICE

I certify that on the 16th day of December, 2015, I delivered a true and correct copy of the foregoing Objection to the standing chapter 13 trustee by ECF Notification, and to the U.S. Trustee's Office by ECF Notification.

/s/ Jeremy B. Atwood
Attorney for Debtor